

	<b>JULIO SUAREZ;</b>	:	Civil Rights Complaint
	<b>DANIEL R. BINDERUP;</b>	:	42 U.S.C. § 1983
	<b>DANIEL F. MILLER;</b>	:	
710	<b>FIREARMS POLICY</b>	:	Civil Action No. 1:21-CV-
	<b>COALITION, INC.; and,</b>	:	
	<b>SECOND AMENDMENT</b>	:	
	<b>FOUNDATION,</b>	:	
		:	
	Plaintiffs	:	
	<b>v.</b>	:	
		:	
	<b>COL. ROBERT EVANCHICK,</b>	:	

Commissioner of Pennsylvania :  
State Police :  
Defendant :

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**JOINT PROPOSED PRE-TRIAL SCHEDULE**

Consistent with the Court's Order of June 24, 2022 (Doc. 33), the Parties respectfully propose the following pre-trial schedule and allowances for briefing:

1. On or by September 13, 2022, Plaintiffs shall submit their Motion for Summary Judgment, brief in support, and concise statement of material facts.
2. On or by September 13, 2022, Defendant shall submit his Motion to Dismiss or, in the alternative, Motion for Summary Judgment,<sup>1</sup> brief in support, and concise statement of material facts.
3. On or by October 13, 2022, Plaintiffs shall file their brief in opposition to Defendant's Motion to Dismiss, or in the alternative, Motion for Summary Judgment, and response to Defendant's concise statement of material facts.
4. On or by October 13, 2022, Defendant shall file his brief in opposition to Plaintiffs' Motion for Summary Judgment, and response to Plaintiffs' concise statement of material facts.
5. In the event the Parties believe it necessary, on or by October 28, 2022, the Parties may each file reply briefs in support of their respective motions.
6. The principal briefs in support and opposition of the Parties may not exceed 10,000 words, without further permission of the Court.

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<sup>1</sup> Motions to dismiss or, in the alternative, to grant summary judgment strike a balance between ensuring a party's rights are fully protected for appellate review purposes and ensuring judicial and party economy. *See generally, Suarez v. Holder*, 255 F.Supp.3d 573 (M.D. Pa. 2015), *aff'd sub nom. Binderup v. Attorney Gen. United States of Am.*, 836 F.3d 336 (3d Cir. 2016).

7. The reply briefs, if any, of the Parties may not exceed 5,000 words, without further permission of the Court.

**WHEREFORE**, the Parties respectfully request that the Court approved the Parties proposed pre-trial schedule. A proposed order is attached hereto.

Respectfully Submitted,

/s/ Joshua Prince

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*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed electronically through the Middle District of Pennsylvania Electronic Filing System. Notice of this filing will be sent by operation of the Court's Electronic Filing System to all registered users in this case.

**Civil Rights Defense Firm, P.C.**

Date: July 1, 2022

/s/ Joshua Prince  
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